

IN THE UNITED STATES DISTRICT
COURT FOR THE WESTERN DISTRICT
OF TEXAS AUSTIN DIVISION

FLASHPARKING, INC. §
§
§
V. § Civil No. 1:23-CV-772-DII
§
MICHAEL SELLERS MACDONALD §

**PLAINTIFF'S AGREED MOTION TO EXTEND DEADLINE TO
RESPOND TO DEFENDANT'S MOTION TO STAY DISCOVERY**

Plaintiff FlashParking, Inc. (“FlashParking”) files this Agreed Motion to Extend the Deadline to Respond to Defendant’s Motion to Stay Discovery Pending Orders on Motion to Dismiss and Motion to Remand (the “Motion to Stay”) filed by Defendant Michael Sellers MacDonald (“MacDonald”) [Doc. 24] requesting an extension for its response from December 28, 2023 to January 11, 2024. In support thereof, FlashParking provides the following good cause:

1. MacDonald filed his Motion to Stay on December 21, 2023. *See* Doc. 24. Pursuant to Local Rule CV-7(d)(2), FlashParking’s response to the Motion to Stay would be due December 28, 2023.
2. FlashParking’s counsel reached out to MacDonald’s counsel to request an extension of FlashParking’s deadline to January 11, 2024. MacDonald’s counsel agreed to FlashParking’s request.
3. This is FlashParking’s first request for an extension of its deadline to respond.
4. FlashParking requests this extension given counsel’s unavailability during the holiday season.

PRAYER

For all the foregoing reasons, FlashParking respectfully requests that this Court grant its motion to extend the deadline to respond to MacDonald's Motion to Stay to January 11, 2024.

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFF
FLASHPARKING, INC.

CERTIFICATE OF CONFERENCE

I hereby certify that on December 21, 2023, counsel for Plaintiff reached out to counsel for Defendant regarding the substance of this motion. On December 21, 2023, counsel for Defendant responded and agreed to the request for extension.

/s/ Lessie C. Gilstrap
Lessie C. Gilstrap

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of December, 2023, the foregoing was served upon counsel of record through the Court's CM/ECF filing system:

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